Kansas Department of Health and Environment
Bureau of Waste Management Policy 01-01

related to

Storage Time for Universal Waste Lamp Processors

May 21, 2001

Background
Many types of lamps, when discarded, are considered hazardous waste. To promote recycling, EPA has created an alternative set of management standards for certain types of hazardous wastes referred to as "Universal Wastes." Types of lamps classified as Universal Waste include: fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps.

In Kansas, each facility that receives hazardous waste from off-site has been required to obtain a storage facility permit if the waste is stored for more than 24 hours or is not processed within 24 hours. Because of the nature of their operations, Universal Waste destination facilities that process waste lamps may not be able to consistently meet the 24-hour time limit, but the requirements of obtaining and complying with a hazardous waste storage facility permit would be prohibitive for many of these small businesses.

Purpose
Since storage of intact Universal Waste Lamps for more than 24 hours poses minimal risk of causing health problems or environmental damage, KDHE is expanding the time frame for storing and processing the incoming wastes to help these recycling facilities operate without the undue regulatory burden of a hazardous waste storage facility permit.

Universal Waste Lamp processing facilities in Kansas are required by K.S.A. 65-3402(o) to operate under a solid waste processing facility permit. This solid waste permit requires the facility to have an operating plan, closure plan, and financial assurance to provide for disposal of all processed and unprocessed waste.

Action
This Bureau of Waste Management policy extends the time that Universal Waste Lamp processing facilities may store and completely process lamps classified as Universal Waste from 24 to 72 hours.

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William L. Bider   5-22-01
Director, Bureau of Waste Management   Date